

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION  
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, JOHN DOES 1 THROUGH  
5, and JANE DOES 1 THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

Plaintiff Direct Report Corporation d/b/a/ Shareholder.com (“Shareholder”) and defendants CCBN.com, Inc. (“CCBN”) and The Thomson Corporation (“Thomson”) respectfully submit this Joint Motion to Extend Discovery Deadline in the above-captioned matter. The parties request that the current fact discovery deadline be extended 60 days, from April 1, 2005, to June 1, 2005, and that all subsequent deadlines in the Scheduling Order be extended by 60 days. In support of this joint motion, the parties state as follows:

- (1) under the current Scheduling Order entered by the Court, fact discovery in this matter is scheduled to close by April 1, 2005;
- (2) the parties have been diligently pursuing party and non-party discovery, and have already completed numerous depositions and plan to complete five more depositions before the end of March;
- (3) on March 2, 2005, Magistrate Judge Alexander issued rulings on several discovery motions, certain of which require, by April 1, the production of many thousands of

additional documents and the supplementation of interrogatory answers that may likely lead to additional discovery;

(4) also on March 2, 2005, Magistrate Judge Alexander ordered the production of documents from the Massachusetts Attorney General's Office, which documents have not yet been produced and which may also lead to additional discovery;

(5) on February 15, 2005, Shareholder filed a motion to amend the complaint to add an additional party as a defendant; this motion will not even be fully briefed until after the discovery deadline and the outcome of the motion may impact further discovery; and

(6) each party has alleged a number of additional discovery issues by the other party that may lead to the need for additional discovery that cannot be completed prior to the current discovery deadline.

Accordingly, the parties respectfully request that the fact discovery deadline in this matter be extended from April 1, 2005 to June 1, 2005, and that all subsequent scheduling order deadlines be extended by 60 days, as set forth in the accompanying proposed order.

Respectfully submitted,

PALMER & DODGE LLP

GOODWIN PROCTER LLP

/s/ Thane D. Scott  
Thane D. Scott (BBO# 449340)  
Ruth T. Dowling (BBO# 645568)  
John T. Bennett (BBO# 648464)

111 Huntington Avenue  
Boston, MA 02199  
(617) 239-0657

*Counsel for Plaintiff*

/s/ David M. Moss  
Anthony S. Fiotto (BBO# 558089)  
David M. Moss (BBO# 649707)  
Karin M. Bell (BBO# 654242)

Exchange Place  
Boston, MA 02109-2881  
(617) 570-1000

*Counsel for Defendants*

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**[PROPOSED] ORDER**

The parties' Joint Motion to Extend Discovery Deadline is hereby GRANTED as follows:

Fact discovery deadline: 6/1/05

Submission of expert reports on claims/counterclaims as to which party bears

burden of proof: 7/1/05

Rebuttal expert reports: 8/1/05

Expert discovery deadline: 9/1/05

Summary Judgment Motion filing deadline: 10/3/05

Opposition to Summary Judgment Motions: 10/17/05

Hearing on Summary Judgment or Pretrial Conference: \_\_\_\_\_.

SO ORDERED:

\_\_\_\_\_  
United States District Judge

Dated: \_\_\_\_\_, 2005

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